

Milo Petranovich, OSB No. 813376
petranovichm@lanepowell.com
Tanya D. Urbach, OSB No. 962668
urbacht@lanepowell.com
LANE POWELL PC
601 SW Second Avenue, Suite 2100
Portland, Oregon 97204-3158
Telephone: 503.778.2100
Facsimile: 503.778.2200

Attorneys for Defendant Henrik Nørremark

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

In re IN RE VESTAS WIND SYSTEMS A/S
SECURITIES LITIGATION

Case No. 3:11-cv-00585-AC

CLASS ACTION

This Document Relates To:

ALL ACTIONS.

Defendant Henrik Nørremark 's
MOTION TO DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT

(ORAL ARGUMENT REQUESTED)

LR 7-1 CERTIFICATE OF COMPLIANCE

Counsel for defendant Henrik Nørremark ("defendant Nørremark") certifies that she attempted to confer in good faith with plaintiff's counsel on April 17, 2013, via telephone conference. The parties were not able to resolve this dispute.

MOTION

Pursuant to Federal Rule of Civil Procedure 12(b)(6) and Federal Rule of Civil Procedure 9, defendant Nørremark, by and through his counsel of record, respectfully moves this Court to
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FIRST AMENDED COMPLAINT

dismiss plaintiffs' First Amended Complaint with prejudice, because it fails to state a claim for which relief can be granted.

This motion is supported by defendant Nørremark's accompanying Memorandum in Support of the Motion to Dismiss, Vestas Wind Systems A/S and Vestas-American Wind Technology, Inc.'s Memorandum in Support of Motion to Dismiss Plaintiffs' First Amended Complaint, Nørremark's Request for Judicial Notice, the Declaration of Tanya D. Urbach in Support of Request for Judicial Notice, and the files and records of this case.

DATED: April 22, 2013

LANE POWELL PC

By s/ Tanya D. Urbach
Milo Petranovich, OSB No. 813376
Tanya D. Urbach, OSB No. 962668
Telephone: 503.778.2100
Attorneys for Defendant Henrik Nørremark

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503.778.2100 FAX: 503.778.2200